

U.S. Department of Justice
Washington, DC 20530

Registration Statement
Pursuant to the Foreign Agents Registration Act of 1938, as amended

I--REGISTRANT

1. Name of Registrant

Vinson & Elkins LLP

2. Registration Number (To be assigned by the FARA Unit)

7498

3. Primary Business Address

845 Texas Avenue, Suite 4700, Houston, TX 77002

4. If the registrant is an individual, furnish the following information:

- (a) Residence address(es)

- (b) Nationality
- (c) Year of birth
- (d) Present citizenship
- (e) If present citizenship not acquired by birth, state when, where and how acquired
- (f) Occupation

5. If the registrant is not an individual, furnish the following information:

- (a) Type of organization: Committee Association Partnership Voluntary group
Corporation Other (*specify*) _____
- (b) Date and place of organization 09/01/1917, Houston, Texas

- (c) Name of responsible individual Keith Fullenwider
(e.g., officer, director or partner)

- (d) Other business address(es), if any, including
locations of branch or local offices See Appendix for Additional Addresses

- (e) If a membership organization, provide number of members

(f) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address	Citizenship	Position
Camilo Cardozo	Providing to FARA Unit by Separate Cover	COLOMBIA	Partner
Ephraim wernick	Providing to FARA Unit by Separate Cover	UNITED STATES	Partner

See Appendix for Additional Names

(g) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Name	Foreign Principal(s)	Services
See Appendix for Response		

(h) Describe the nature of the registrant's regular business or activity.

Law firm

(i) Give a complete description of the ownership and control structure of the registrant.

The registrant is a Limited Liability Partnership with approximately 200 partners. The firm is managed by a four member Executive Committee with Keith Fullenweider as its Chair, and James Fox, Hilary Preston, and Michael Holmes as Vice-Chairs.

6. List all individuals, other than those listed in Item 5(g), who render services or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address	Foreign Principal(s)	Services
Peter Thomas	Providing to FARA Unit by Separate Cover	Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board")	Assist the client in interacting with OFAC and other U.S. government agencies, which will require engagement of public relations and lobbying service providers to provide unique assistance to support our legal services, including investigations and potential litigation.

II--FOREIGN PRINCIPAL

7. List every foreign principal¹ for whom the registrant is acting or has agreed to act.

Foreign Principal	Foreign Principal Address
Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board")	2216 Adams St #307 Hollywood, FL 33020

III--ACTIVITIES

8. In addition to the activities described in any Exhibit B to this statement, will the registrant engage or is the registrant engaging now in activity or rendering services on its own behalf which benefits any or all of its foreign principals?

Yes No

If yes, describe fully.

Foreign Principal	Activities/Services
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IV--FINANCIAL INFORMATION

9. (a) **RECEIPTS-MONIES**

During the period beginning 60 days prior to the date of the registrant's obligation to register² under FARA, has the registrant received from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income, or money either as compensation, or for disbursement or otherwise?

Yes No

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.³

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board")	10/10/2024	PDVSA Ad Hoc Board	Non-registerable legal services	\$ 545,241.48	
Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board")	-----	-----	-----	----->	\$ 545,241.48

\$ 545,241.48

Total

¹ The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual.

² An agent must register within 10 days of becoming an agent, and before acting as such.

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, monies, or other things of value for a foreign principal, as part of a fundraising campaign. There is no printed form for this exhibit. (See Rule 201(e), 28 C.F.R. § 5.201(e)).

(b) RECEIPTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of the registrant's obligation to register⁴ under FARA, has the registrant received anything of value⁵ other than money, from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes No

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
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10. (a) DISBURSEMENTS-MONIES

During the period beginning 60 days prior to the date of the registrant's obligation to register⁶ under FARA, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Item 7 of this statement or transmitted monies to any such foreign principal?

Yes No

If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
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See Appendix for Response

\$ 2,814.79

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of the registrant's obligation to register⁷ under FARA, has the registrant disposed of any thing of value⁸ other than money in furtherance of or in connection with its activities on behalf of any foreign principal named in Item 7 of this statement? Yes No

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During the period beginning 60 days prior to the date of the registrant's obligation to register⁹ under FARA, has the registrant (or any short form registrant) made any contribution of money or other thing of value from its own funds and on its own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes No

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
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4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 Things of value include but are not limited to gifts, interest-free loans, expense-free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks", and the like.

V--INFORMATIONAL MATERIALS¹⁰

11. Prior to the time of filing this statement,¹¹ has the registrant prepared, disseminated, or caused to be disseminated, any informational materials on behalf of any foreign principal listed in Item 7 of this statement?

Yes No

If yes, identify each foreign principal and file the informational materials.

Foreign Principal	Type of Informational Materials
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12. (a) Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials?

Yes No

(b) If yes, identify each foreign principal and respond to the remaining items in this section.

13. Has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes No

If yes, identify each foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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14. Will any individuals or organizations, including public relations firms or publicity agents, participate in the preparation or dissemination of such informational materials?

Yes No

If yes, furnish the names and addresses of such individuals or organizations.

Name	Address	Foreign Principal(s)
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15. Activities in preparing or disseminating informational materials will include the use of the following:

- | | | | |
|---|---|---|--|
| <input type="checkbox"/> Magazine or newspaper | <input type="checkbox"/> Advertising campaigns | <input type="checkbox"/> Press releases | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams |
| <input type="checkbox"/> Email | | | |
| <input type="checkbox"/> Website URL(s): _____ | | | |
| <input type="checkbox"/> Social Media website URL(s): _____ | | | |
| <input type="checkbox"/> Other (<i>specify</i>) _____ | | | |

¹⁰ The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, electronic communications, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

¹¹ See Footnote 2, on page 3.

16. Informational materials will be disseminated among the following groups:

- | | |
|--|---|
| <input type="checkbox"/> Public officials | <input type="checkbox"/> Civic groups or associations |
| <input type="checkbox"/> Legislators | <input type="checkbox"/> Libraries |
| <input type="checkbox"/> Government agencies | <input type="checkbox"/> Educational groups |
| <input type="checkbox"/> Newspapers | <input type="checkbox"/> Nationality groups |
| <input type="checkbox"/> Editors | <input type="checkbox"/> Other (<i>specify</i>) _____ |

17. Indicate the language to be used in the informational materials:

- English Other (*specify*) _____

VI--EXHIBITS AND ATTACHMENTS

18. (a) The following described exhibits shall be filed with a Registration Statement:

Exhibit A- This exhibit, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal named in Item 6.

Exhibit B- This exhibit, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

(b) An Exhibit C shall be filed when applicable. This exhibit, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530. (See Rule 201(c) and (d)).

(c) An Exhibit D shall be filed when applicable. This exhibit, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal. (See Rule 201 (e)).

VII--EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature ¹²
12/10/2024	Robert Denby	<input type="text" value="Sign"/> /s/Robert Denby
_____	_____	<input type="text" value="Sign"/> _____
_____	_____	<input type="text" value="Sign"/> _____
_____	_____	<input type="text" value="Sign"/> _____

12 This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

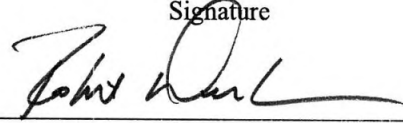
Date

Printed Name

Signature

12/10/24

ROBERT DENBY



Appendix
Response to Item 5(d) Attached

Item 5(d): If the registrant is not an individual, furnish the following information: Other business address(es), if any, including locations of branch or local offices.

Item 5(d): If the registrant is not an individual, furnish the following information: Other business address(es), if any, including locations of branch or local offices.

List of Branch/Local Office Addresses

200 West 6th Street
Suite 2500
Austin, TX 78701

2001 Ross Avenue
Suite 3900
Dallas, TX 75201

First Avenue Plaza
44 Cook Street
Suite 320
Denver, CO 80206

Gate Village 10, Office 211
P.O. Box 504945
Dubai International Financial Centre (DIFC)
Dubai, United Arab Emirates

53 Merrion Square S
Suite 303
Dublin 2 D02 PR63

20 Fenchurch Street
24th Floor
London EC3M 3BY
UK

350 South Grand
Suite 2100
Los Angeles, CA 90071

1114 Avenue of the Americas
32nd Floor
New York, NY 10036

901 East Byrd Street
Suite 1500
Richmond, VA 23219

555 Mission Street
Suite 2000
San Francisco, CA 94105

Marunouchi Kitaguchi Building, 27th Floor
1-6-5 Marunouchi, Chiyoda-ku
Tokyo 100-0005
JP2

2200 Pennsylvania Avenue NW
Suite 500 West
Washington, DC 20037

Appendix
Response to Item 5(f) Attached

Item 5(f): If the registrant is not an individual, furnish the following information: List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

List of Partners/Officers/Directors

Name	Citizenship	Position	Address
Keith Fullenweider	United States	Chair of the Executive Committee	Providing to FARA Unit by Separate Cover
Jim Fox	United States	Vice Chair of the Executive Committee	Providing to FARA Unit by Separate Cover
Hilary Preston	United States	Vice Chair of the Executive Committee	Providing to FARA Unit by Separate Cover
Michael Holmes	United States	Vice Chair of the Executive Committee	Providing to FARA Unit by Separate Cover

Appendix Response to Item 5(g)

Item 5(g): If the registrant is not an individual, furnish the following information: Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Person	Foreign Principal(s)	Services
Camilo Cardozo	Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board")	Assist the client in interacting with OFAC and other U.S. government agencies, which will require engagement of public relations and lobbying service providers to provide unique assistance to support our legal services, including investigations and potential litigation
Ephraim Wernick	Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board")	Assist the client in interacting with OFAC and other U.S. government agencies, which will require engagement of public relations and lobbying service providers to provide unique assistance to support our legal services, including investigations and potential litigation

Appendix Response to Item 10(a)

Item 10(a): DISBURSEMENTS-MONIES: During the period beginning 60 days prior to the date of the registrant's obligation to register under FARA, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Item 7 of this statement or transmitted monies to any such foreign principal? If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	To Whom	Purpose	Amount	Subtotal
Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board")	11/13/2024	Delta Airlines	Travel for non-registerable legal services	\$ 2,197.91	
Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board")	11/13/2024	Hotel Añnico Madrid	Travel for non-registerable legal services	\$ 616.88	
Junta Administradora ad hoc de Petróleos de Venezuela, S.A. (the "PDVSA Ad Hoc Board")	-----	-----	-----	----->	\$ 2,814.79